

Jeffrey H. Howard (*pro hac vice*)
Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
Email: jhoward@crowell.com
jmurphy@crowell.com

Jason C. Murray (CA Bar No. 169806)
Joshua C. Stokes (CA Bar No. 220214)
Nathanial J. Wood (CA Bar No. 223547)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-622-4750
Facsimile: 213-622-2690
Email: jmurray@crowell.com
jstokes@crowell.com

*Liaison Counsel for Undersigned Direct Action
Plaintiffs*

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

This Document Relates To:

*Best Buy Co., Inc., et al. v. AU Optronics
Corporation, et al., Case No. 10-cv-04572 SI*

*Electrograph Systems, Inc., et al. v. Epson
Imaging Devices Corporation, et al., Case No.
10-cv-00117 SI*

*Target Corp., et al. v. AU Optronics
Corporation, et al., Case No. 10-cv-04945 SI*

*Alfred H. Siegel, As Trustee of the Circuit
City Stores, Inc. Liquidating Trust v. AU
Optronics Corporation, et al., Case No. 10-
cv05625 SI*

Master Docket No. 07-m-1827 SI

MDL No. 1827

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING BRIEFING
SCHEDULE FOR LG DISPLAY'S
MOTION FOR LEAVE TO AMEND**

1 *SB Liquidation Trust v. AU Optronics*
2 *Corporation, et al., Case No. 10-cv-05458 SI*

3 *Tracfone Wireless, Inc. v. AU Optronics*
4 *Corporation, et al., Case No. 10-cv-03205 SI*

5 *Costco Wholesale Corporation v. AU*
6 *Optronics Corporation, et al., Case No. 11-*
7 *cv00058 SI*

8 *Motorola Mobility, Inc. v. AU Optronics*
9 *Corporation, et al., C 09-5840 SI*

10 *AT&T Mobility LLC, et al. v. AU Optronics*
11 *Corporation, et al., No. 3:09-cv-4997 SI*

12 *State of Florida v. AU Optronics Corporation, et*
13 *al., Case No. 10-cv-3517 SI.*

14 *State of Missouri, et al. v. AU Optronics*
15 *Corporation, et al., Case No. 10-cv-03619 SI*

16 *State of Oregon, ex rel John Kroger, Attorney*
17 *General v. AU Optronics Corporation, et al.,*
18 *Case No. 3:10-4346 SI*

1 Defendants LG Display America, Inc. and LG Display Co., Ltd. (collectively, “LG
2 Display”) and the Direct Action Plaintiffs (“DAPs”) and State Attorneys General (“AGs”) in the
3 above captioned actions stipulate as follows:

4 WHEREAS LG Display filed a Motion for leave to amend their respective Answers and
5 to add Additional Defenses and a Counterclaim for Declaratory Relief in *Best Buy Co., Inc., et al.*
6 *v. AU Optronics Corporation, et al.*, Case No. 10-cv-04572 SI, *Electrograph Systems, Inc., et al.*
7 *v. Epson Imaging Devices Corporation, et al.*, Case No. 10-cv-00117 SI, *Target Corp., et al. v.*
8 *AU Optronics Corporation, et al.*, Case No. 10-cv-04945 SI, *Alfred H. Siegel, As Trustee of the*
9 *Circuit City Stores, Inc. Liquidating Trust v. AU Optronics Corporation, et al.*, Case No. 10-
10 *cv05625 SI, SB Liquidation Trust v. AU Optronics Corporation, et al.*, Case No. 10-cv-05458 SI,
11 *Tracfone Wireless, Inc. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03205 SI, *Costco*
12 *Wholesale Corporation v. AU Optronics Corporation, et al.*, Case No. 11-cv00058 SI, *Motorola*
13 *Mobility, Inc. v. AU Optronics Corporation, et al.*, C 09-5840 SI, *AT&T Mobility LLC, et al. v.*
14 *AU Optronics Corporation, et al.*, No. 3:09-cv-4997 SI, *State of Florida v. AU Optronics*
15 *Corporation, et al.*, Case No. 10-cv-3517 SI, *State of Missouri, et al. v. AU Optronics*
16 *Corporation, et al.*, Case No. 10-cv-03619 SI, *State of Oregon, ex rel John Kroger, Attorney*
17 *General v. AU Optronics Corporation, et al.*, Case No. 3:10-4346 SI pursuant to Rule 15(a) of the
18 Federal Rules of Civil Procedure on March 22, 2012 (hereafter, “LG Display’s Motion to
19 Amend”);

20 WHEREAS the DAPs and AGs are currently required to file their Opposition to LG
21 Display’s Motion to Amend on or before April 5, 2012;

22 WHEREAS the hearing on LG Display’s Motion to Amend is scheduled to be to be heard
23 on May 18, 2012;

24 WHEREAS the parties desire to continue the briefing schedule for LG Display’s Motion
25 to Amend until after the April 20, 2012 hearing on duplicative recovery in the Indirect Purchaser
26 Plaintiff case, and believe that a continuance will allow for more efficient use of the Court’s and
27 the parties time by potentially streamlining issues for resolution;

28

IT IS HEREBY STIPULATED AND AGREED by the undersigned DAPs, AGs, and LG Display, by and through their undersigned liaison counsel and subject to the concurrence of the Court, as follows:

(1) The time for the undersigned DAPs and AGs served with LG Display's Motion to Amend to file their Oppositions to LG Display's Motion shall be extended to and including April 27, 2012. The DAPs shall file a single opposition brief to LG Display's Motion to Amend.

(2) LG Display's time to file its Reply(ies) in support of its Motion shall be extended to and including May 8, 2012.

DATED: April 5, 2012

Liaison Counsel for Direct Action Plaintiffs and Counsel for Motorola Mobility, Inc.; AT&T Mobility, LLC; AT&T Corp.; AT&T Services, Inc.; BellSouth Telecommunications, Inc.; Pacific Bell Telephone Company; AT&T Operations, Inc.; AT&T DataComm, Inc.; Southwestern Bell Telephone Company; Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old Comp Inc.; Good Guys, Inc.; RadioShack Corporation; and Newegg Inc.

By: /s/ Joshua C. Stokes

Jerome A. Murphy (*pro hac vice*)

Jeffrey H. Howard (*pro hac vice*)

CROWELL & MORING LLP

1001 Pennsylvania Avenue, N.W.

Washington, DC 20004

Telephone: (202) 623-2500

Facsimile: (202) 628-5116

Email: jmurphy@crowell.com

Email: jhoward@crowell.com

Jason C. Murray (CA Bar No. 169806)

Joshua C. Stokes (CA Bar No. 220214)

CROWELL & MORING LLP

515 South Flower St., 40th Floor

Los Angeles, CA 90071

Telephone: (213) 443-5582

Facsimile: (213) 622-2690

Email: jmurray@crowell.com

Email: jstokes@crowell.com

R. Bruce Holcomb (*pro hac vice*)

ADAMS HOLCOMB LLP

1875 Eye Street NW

Washington, DC 20006

Telephone: (202) 580-8820

Facsimile: (202) 580-8821

Email: holcomb@adamsholcomb.com

1
2 *Counsel for SB Liquidation Trust*

By: /s/ David H. Orozco
DIAMOND MCCARTHY LLP
Allan Diamond, Esq.
James D. McCarthy, Esq.
Jason Fulton, Esq.
909 Fannin, Suite 1500
Houston, Texas 77010
Telephone: (713) 333-5104
Facsimile: (713) 333-5199
Email: adiamond@diamondmccarthy.com
jmccarthy@diamondmccarthy.com
jfulton@diamondmccarthy.com

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUSMAN GODFREY LLP
Marc M. Seltzer, Esq.
Ryan C. Kirkpatrick, Esq.
David H. Orozco, Esq.
Steven G. Sklaver, Esq.
1901 Avenue of the Stars
Suite 950
Los Angeles, CA 90067-6029
Telephone : (310) 789-3100
Facsimile: (310) 789-3150
Email: mseltzer@susmangodfrey.com
rkirkpatrick@susmangodfrey.com
dorozco@susmangodfrey.com
ssklaver@susmangodfrey.com

21
22 *Counsel for Plaintiffs Alfred H.
Siegel, as Trustee of the Circuit City
Stores Inc. Liquidating Trust*

By: /s/ Jonathan Ross
Jonathan Ross
SUSMAN GODFREY LLP
1000 Louisiana, Ste, 5100
Houston, TX 77002
Telephone: (713) 653-7813
Facsimile: (713) 654-6666

*Counsel for Plaintiffs Electrograph
Systems, Inc. and Electrograph
Technologies Corp.*

By: /s/ Philip J. Iovenio
BOIES, SCHILLER & FLEXNER LLP
William A. Isaacson (admitted pro hac vice)
Boies, Schiller & Flexner LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

BOIES, SCHILLER & FLEXNER LLP
Philip J. Iovenio (admitted pro hac vice)
10 North Pearl Street
4th Floor
Albany, NY 12207
Telephone: 518-434-0600
Facsimile: 518-434-0665
Email: piovieno@bsflp.com

*Counsel for Plaintiffs Tracfone
Wireless, Inc.*

By: /s/ David B. Esau
CARLTON FIELDS
James Blaker Baldinger, Esq.
David B. Esau, Esq.
CityPlace Tower, Suite 1200
525 Okeechobee Boulevard
West Palm Beach, FL 33401
Telephone : (561) 659-7070
Facsimile: (561) 659-7368
Email: jballdinger@carltonfields.com
desau@carltonfields.com

CARLTON FIELDS
Robert L. Ciotti, Esq.
4221 W Boy Scout Boulevard
10th Floor - Corporate Center III
Tampa, FL 33067-5736
Telephone : (813) 223-7000
Facsimile: (813) 229-4133
Email: rciotti@carltonfields.com

Counsel Counsel for Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; Best Buy.com, LLC; and Magnolia Hi-Fi, Inc.

By: /s/ Roman M. Silberfeld
Roman M. Silberfeld
David Martinez
 ROBINS, KAPLAN, MILLER & CIRESI LLP
 2049 Century Park East, Suite 3400
 Los Angeles, CA 90067-3208
 Telephone: (310) 552-0130
 Facsimile: (310) 229-5800

 rkirkpatrick@susmangodfrey.com
 dorozco@susmangodfrey.com
 ssklaver@susmangodgrey.com

Counsel for Plaintiffs Costco Wholesale Corporation

By: /s/ David J. Burman
David J. Burman
 PERKINS COIE LLP
 1201 Third Avenue
 Suite 4800
 Seattle, WA 98101-3099
 Telephone: (206) 359-8000
 Facsimile: (206) 359-9000

Attorneys for Plaintiff State of Florida

By: /s/ Nicholas J. Weilhammer
Nicholas J. Weilhammer
 STATE OF FLORIDA
 Pro Hac Vice
 Office of the Attorney General
 State of Florida
 PL-01, The Capitol
 Tallahassee, FL 32399-1050
 Tel: (850) 414-3300
 Fax: (850) 488-9134

Attorneys for Plaintiff State of Missouri

By: /s/ Anne E. Schneider
Anne E. Schneider
 STATE OF MISSOURI
 Assistant Attorneys General
 Missouri Attorney General Office
 P. O. Box 899
 Jefferson City, MO 65102

*Attorneys for Plaintiff State of
Arkansas*

By: /s/ Kevin Wells
Kevin Wells
STATE OF ARKANSAS
Assistant Attorney General
Arkansas Attorney General Office
323 Center Street, Suite 500
Little Rock, AR 72201

*Attorneys for Plaintiff State of
Michigan*

By: /s/ M. Elizabeth Lippitt
M. Elizabeth Lippitt
STATE OF MICHIGAN
Assistant Attorney General
Michigan Attorney General Office
Corporate Oversight Division
525 West Ottawa Street, 6th Floor
Lansing, MI 48933

*Attorneys for Plaintiff State of West
Virginia*

By: /s/ Douglas L. Davis
Douglas L. Davis
STATE OF WEST VIRGINIA
Assistant Attorney General
West Virginia Attorney General Office
812 Quarrier St., First Floor
Charleston, WV 25301

*Attorneys for Plaintiff State of
Wisconsin*

By: /s/ Gwendolyn J. Cooley
Gwendolyn J. Cooley
STATE OF WISCONSIN
Assistant Attorney General
Wisconsin Department of Justice
PO Box 7857
Madison, WI 53707

*Attorneys for Plaintiff State of
Oregon*

By: /s/ Michael E. Haglund
Michael E. Haglund (pro hoc vice)
Michael K. Kelley (pro hoc vice)
STATE OF OREGON
HAGLUND KELLEY JONES & WILDER LLP
Special Assistant Attorneys General for
the State of Oregon
200 SW Market Street, Suite 1777
Portland, Oregon 97201

Tim D. Nord, OSB No. 882800
Oregon Senior Assistant Attorney General
1162 Court Street, NE
Salem, OR 97301-4096
Telephone: (503) 943-4400
Facsimile: (503) 225-1257

*Counsel for Defendants LG Display
Co., Ltd. and LG Display America,
Inc.*

By: /s/ Lee F. Berger
Holly A. House (SB# 136045)
hollyhouse@paulhastings.com
Kevin C. McCann (SB# 120874)
kevinmccann@paulhastings.com
Sean D. Unger (SB# 231694)
seanunger@paulhastings.com
PAUL HASTINGS LLP
55 Second Street
Twenty-Fourth Floor
San Francisco, CA 94105-3441
Telephone: (415) 856-7000
Facsimile: (415) 856-7100


Lee F. Berger (SB# 222756)
leeberger@paulhastings.com
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, DC 20005
Telephone: (202) 551-1772
Facsimile: (202) 551-0172

Gregory J. Weingart (State Bar No. 157997)
Hailyn J. Chen (State Bar No. 237436)
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

1
2 **Michael R. Lazerwitz** (pro hac vice)
3 CLEARY GOTTlieb STEEN & HAMILTON
4 LLP
5 One Liberty Plaza
6 New York, NY 10006
7 Telephone: (212) 225-2000
8 Facsimile: (212) 225-3999

9 **IT IS SO ORDERED.**

10 DATED: April 6 2012

11 
12 _____
13 Hon. Susan Illston, United States District Judge

14 Attestation: The filer of this document attests that the concurrence of the signatories
15 thereto has been obtained.

16 DCACTIVE-18025086.4
17
18
19
20
21
22
23
24
25
26
27
28